



1 Plaintiff Sandra Verma ("Plaintiff") and defendant American Express Travel Related  
2 Services Company, Inc. ("TRS"), by and through their respective counsel of record in this action,  
3 hereby present the following Stipulation and Proposed Order seeking to extend certain discovery  
4 deadlines in this case as follows:

5 WHEREAS, Plaintiff filed this action on April 17, 2008;

6 WHEREAS, this case is currently set for trial beginning September 21, 2009;

7 WHEREAS, the current deadline for the parties to designate their respective experts is June  
8 8, 2009, with designation of rebuttal expert witnesses to occur by June 19, 2009;

9 WHEREAS, the Court indicated at the Case Management Conference held in this matter on  
10 March 20, 2009 that it would consider a stipulation by the parties seeking an order extending the  
11 deadlines pertinent to expert discovery in this case;

12 WHEREAS, the parties agree that, given the current status of the litigation, extending the  
13 current deadlines pertinent to expert discovery in this case as set forth below will best facilitate the  
14 efficient handling of this litigation going forward;

15 WHEREAS, the current non-expert discovery cutoff in this case is June 22, 2009;

16 WHEREAS, the parties have been working to schedule the depositions of various witnesses  
17 but have not been able to identify mutually agreeable dates for those depositions falling on or prior  
18 to June 22, 2009;

19 WHEREAS, the parties had agreed to schedule the deposition of Greg Johnson, an  
20 employee for TRS, for June 11, 2009, but now must reschedule the deposition due to the fact that  
21 Mr. Johnson has a scheduling conflict resulting from an unexpected emergency;

22 WHEREAS, the parties have been diligently working together to schedule depositions but  
23 believe that a few of the depositions, including third party depositions, may not be able to be  
24 scheduled and completed prior to June 22, 2009;

25 WHEREAS, the parties believe that a three-week extension of the non-expert discovery  
26 cutoff solely for purposes of completing the anticipated depositions will facilitate the scheduling  
27 and completion of all anticipated depositions;

28 WHEREAS, pursuant to Northern District Civil Local Rule 6-2(a), the Declaration of

1 Connor J. Moyle in support of the parties' Stipulation and Proposed Order is filed concurrently  
2 herewith;

3 WHEREAS, the requested modifications of deadlines set forth above will not affect any  
4 hearing dates or appearances currently set on the Court's calendar, and will not necessitate the  
5 modification of other deadlines;

6 WHEREAS, the parties jointly stipulate, pursuant to Northern District Civil Local Rules  
7 6-1(b) and 6-2, to request that the Court issue an order extending the deadlines pertinent to  
8 discovery in this matter as set forth below;

9 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES AND THEIR  
10 COUNSEL OF RECORD THAT:

11 (1) The deadline for the parties' respective designation of experts, currently set for June  
12 8, 2009, shall be extended to June 29, 2009;

13 (2) The deadline for the parties' respective designation of rebuttal experts, currently set  
14 for June 19, 2009, shall be extended to July 10, 2009;

15 (3) The expert discovery cutoff date, currently set for August 10, 2009, shall be  
16 extended to August 31, 2009;

17 (4) The non-expert discovery cutoff, currently set for June 22, 2009, shall be extended  
18 to July 13, 2009 for purposes of scheduling and completing depositions.

19 IT IS SO STIPULATED.

20 Dated: June 5, 2009

CARLTON DiSANTE & FREUDENBERGER LLP  
Leigh A. White  
Connor J. Moyle

23 By: /S/ - Connor J. Moyle

24 Connor J. Moyle  
Attorneys for Defendant  
AMERICAN EXPRESS TRAVEL RELATED SERVICES  
25 COMPANY, INC.  
26  
27  
28

1 Dated: June 5, 2009

PIERCE & SHEARER LLP  
Andrew F. Pierce  
Stacy A. Smith

4 By: /S/ - Stacy A. Smith

Stacy A. Smith

Attorneys for Plaintiff  
SANDRA VERMA

8 IT IS HEREBY ORDERED THAT:

9 (1) The deadline for the parties' respective designation of experts, currently set for June  
10 8, 2009, shall be extended to June 29, 2009;

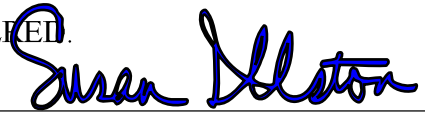
11 (2) The deadline for the parties' respective designation of rebuttal experts, currently set  
12 for June 19, 2009, shall be extended to July 10, 2009;

13 (3) The expert discovery cutoff date, currently set at June 22, 2009, shall be extended to  
14 August 31, 2009;

15 (4) The non-expert discovery cutoff, currently set for June 22, 2009, shall be extended  
16 to July 13, 2009 for purposes of scheduling and completing depositions.

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19 Dated: \_\_\_\_\_

  
The Honorable Susan Illston  
Judge of the United States District Court for  
The Northern District of California